

**IN AND BEFORE THE
FEDERAL ELECTION COMMISSION**

In re:)
Rick Santorum for President,)
and Nadine Maenza, in her official)
capacity as Treasurer,)
Rick Santorum, and Bill Dore')
)

MUR 6747

2013 DEC -3 11:45:52
OFFICE
FEDERAL ELECTION COMMISSION

**RESPONSE TO COMPLAINT &
MOTION TO DISMISS COMPLAINT**

Rick Santorum for President and its Treasurer, Nadine Maenza, in her official capacity as Treasurer of the Committee ("Treasurer"), ("the Committee"), Rick Santorum ("Sen. Santorum") and William J. Dore' ("Mr. Dore'"), (collectively hereafter "Respondents"), file this joint Response and Complaint filed with the Federal Election Commission ("Commission") by Complainants Campaign Legal Center and Democracy 21 ("Complainants"), alleging that Respondents have committed a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") ("MUR 6747").

Respondents affirmatively state that neither the Committee nor its Treasurer nor either of the individual Respondents Sen. Santorum or Mr. Dore have committed any violation of the Act.

FACTS

Complainants have relied upon a third party blog as the "source" for this complaint, without any validation or verification of the facts whatsoever. The Complaint references an article by Keenan Steiner, "*The \$1 million dinner: When big donor Bill Dore meets Rick Santorum*", SUNLIGHT FOUNDATION REPORTING GROUP, July 1, 2013, <http://reporting.sunlightfoundation.com/2013/1-million-dinner-when-big-donor-bill-dore-meets-rick-santorum> (hereinafter *The \$1 million dinner*).

The problem with the blog report and the complaint is that Respondents' records reflect the following sequence of events:

January 10, 2012: Mr. Dore' wire transfer of \$1,000,000 to Red, White & Blue Fund

January 22, 2012: Mr. Dore' and Sen. Santorum met for dinner in Ft. Lauderdale

February 1, 2012: Mr. Dore' personal check for \$2500 to Rick Santorum for President.

Respondents have searched their records to ascertain when and where the first meeting between Mr. Dore' and Sen. Santorum occurred, and have confirmed that it took place on January 22, 2012.

Thus, the complaint arises from a "meeting" where Sen. Santorum supposedly "solicited" or "directed" a \$1,000,000 contribution to the Red, White and Blue Fund from Mr. Dore'...except for the fact that the meeting described in the Sunlight Foundation article took place two weeks AFTER Mr. Dore' had already contributed \$1,000,000 to the Red, White and Blue Fund.

See attached:

Exhibit A, Wire Transfer Information for Contribution to Red, White & Blue Fund, dated January 10, 2012;

Exhibit B, Email exchange confirming dinner meeting for Sen. Santorum and Bill Dore' on January 22, 2012 in Ft. Lauderdale, FL;

Exhibit C, Check for \$2500 from Bill Dore' to Rick Santorum for President, dated February 1, 2012.

Exhibit D, Affidavit of Rick Santorum

Exhibit E, Affidavit of Nadine Maenza

Exhibit F, Affidavit of Jesse Biter

Exhibit G, Affidavit of William J. Dore'

Sen. Rick Santorum and Nadine Maenza both attest to the fact that they did not solicit contributions to Red, White and Blue Fund with any donor, including (but not limited to) Mr. Dore'. Jesse Biter attests to the fact that the meeting on January 22, 2012 between Rick Santorum and Bill Dore' was, in fact, the first meeting between the two and further that the Santorum campaign was scrupulous about not soliciting funds for or directing donors to contribute to Red, White & Blue Fund.

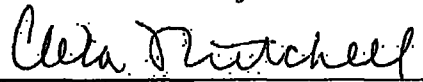
Mr. Dore' attests that he did not discuss his contribution(s) to Red, White and Blue Fund with anyone from the Santorum campaign, but rather only with Nick Ryan from Red, White and Blue Fund.

This is yet another of the false, frivolous and completely groundless complaints filed by Fred Wertheimer and Paul Ryan, who seem never to let facts stand in the way of trying to score political points. There is no factual basis for this Complaint whatsoever and it should be dismissed.

CONCLUSION

For the reasons stated above and because neither the facts nor the law support a finding by the Commission of Reason To Believe that Respondents have violated the Act, Respondents respectfully move the Commission to dismiss the MUR and for such other necessary relief as deemed appropriate by the Commission.

Respectfully Submitted,



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Submitted this 26th day of November, 2013

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